

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

PATRICIA U. HINES
ASSOCIATE
TEL: (212) 238-4804
EMAIL: phines@lcbf.com

120 BROADWAY
13TH FLOOR
NEW YORK, NEW YORK 10271

TELEPHONE (212) 238-4800
FACSIMILE (212) 238-4848
www.lcbf.com

One Gateway Center
22nd Floor
Newark, NJ 07102
Tel: (973) 623-2700

One Penn Center
1617 JFK Boulevard, Suite 955
Philadelphia, PA 19103
Tel: (215) 561-8540

March 29, 2023


Via ECF

Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Request **GRANTED**. The deadline to submit pretrial filings and any motions *in limine* is extended to **April 6, 2023**. Opposition to any motions *in limine* are due **April 13, 2023**, and any replies are due **April 17, 2023**.

SO ORDERED.

Dated: March 29, 2023
New York, New York


JENNIFER L. ROCHON
United States District Judge

Re: Damon Williams v. National Railroad Passenger Corporation
Civil Action No. 1:22-cv-1647-LGS

Dear Judge Rochon:

We represent defendant National Railroad Passenger Corporation (“Amtrak”) in the above-entitled action. Defendant submits this letter, with the consent of Plaintiff, respectfully requesting a one-week extension of time for both parties to submit the required pretrial filings in accordance with the Court’s Individual Rules.

During the past several weeks, defense counsel has been engaged in numerous depositions, including depositions outside of New York, with another deposition scheduled for tomorrow. Additionally, counsel is preparing a summary judgment motion on an unrelated matter, which is to be filed on Friday, March 31, 2023. As such, it is respectfully requested that: (1) the March 30, 2023 deadline to submit motions *in limine* and required pretrial filings, be extended to April 6, 2023; (2) the April 6, 2023 deadline to submit oppositions to any motions *in limine*, be extended to April 13, 2023; and (3) the April 10, 2023 deadline to submit any replies be extended to April 17, 2023. The parties are **not** seeking an adjournment of the scheduled, June 15, 2023 final pretrial conference.

Thank you for your time and consideration in this matter.

Respectfully Submitted,

/s/ Patricia U. Hines
Patricia U. Hines, Esq.
Attorneys for Defendant

cc: W. Chad Stelly, Esq. (via email: westelly@romearata.com)